

1 DAVID L. ANDERSON (CABN 149604)  
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)  
3 Chief, Criminal Division

4 MICHELLE J. KANE (CABN 210579)  
KATHERINE L. WAWRZYNIAK (CABN 252751)  
5 Assistant United States Attorneys

6 1301 Clay Street, Suite 340S  
Oakland, California 94612  
7 Telephone: (510) 637-3680  
FAX: (510) 637-3724  
8 michelle.kane3@usdoj.gov  
Katherine.Wawrzyniak@usdoj.gov

9 Attorneys for United States of America

10  
11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,	)	No. CR 16-00440 WHA
15	)	
16 Plaintiff,	)	UNITED STATES' AMENDED WITNESS LIST
17	)	
18 v.	)	Trial: March 9, 2020
19	)	Pretrial Conference: February 19, 2020
20 YEVGENIY ALEXANDROVICH NIKULIN,	)	Time: 1:30 p.m.
21	)	Courtroom No. 12
22 Defendant.	)	
23	)	
24	)	
25	)	
26	)	
27	)	
28	)	

21 The United States hereby gives notice to the Court and the defendant of the witnesses it may call  
22 in its case-in-chief in the above-captioned case. This list is intended to be inclusive, is subject to  
23 amendment or supplementation as trial preparations progress, and does not necessarily reflect the order  
24 in which the government will call the witnesses. The government will notify the defense and Court of  
25 any changes to this list.

26 //

Witness Name	Anticipated Testimony
FBI Special Agent Jeffrey Miller	Special Agent Miller will testify regarding the investigation of defendant's computer intrusions at LinkedIn, Dropbox, Formspring, Automatic, and elsewhere. He will also testify regarding defendant's trafficking of credentials stolen from Formspring.  Special Agent Miller may also testify as an expert with regard to the forensic examination of the computer belonging to Oleksander Ieremenko and the market for stolen credentials, as reflected in the government's separate disclosure of expert testimony.
FBI Special Agent Bryant Ling	Special Agent Ling will testify as an expert regarding the defendant's intrusion into and use of Nicholas Berry's computer, as reflected in the government's separate disclosure of expert testimony.
FBI Supervisory Special Agent Emily Odom	Special Agent Odom will testify regarding the identification of defendant's co-conspirators.
FBI Linguist	An FBI linguist will testify as an expert regarding the validity of certain disputed translations.
Barry Abrahamson	Mr. Abrahamson is a "Systems Wrangler" at Automatic. He will testify regarding the defendant's computer intrusion at Automatic, which may include expert testimony regarding analysis of logs and other evidence, as reflected in the government's separate disclosure of expert testimony.
Ade Olonoh	Mr. Olonoh, formerly the Chief Executive Officer of Formspring, will testify regarding defendant's intrusion into Formspring computers and trafficking of Formspring credentials. This may include expert testimony regarding Formspring's system and his analysis of logs and other evidence, as reflected in the government's separate disclosure of expert testimony.
Matt Cudworth	Mr. Cudworth, the former Chief Technology Officer of the successor to Formspring, will testify regarding his confirmation of stolen Formspring credentials.
John Sanders	Mr. Sanders, formerly of Formspring, will testify regarding defendant's use of Sanders' credentials in connection with the computer intrusion at Formspring.
Corey Louie	Mr. Louie was formerly in Trust, Safety, and Security at Dropbox. He will testify regarding the investigation into defendant's computer intrusion at Dropbox.
Nicholas Berry	Mr. Berry, an employee of LinkedIn, will testify regarding defendant's use of Berry's computer and credentials in connection with the computer intrusion at LinkedIn.

Ganesh Krishnan	Mr. Krishnan, formerly LinkedIn Senior Director of Engineering, will testify regarding his investigation of defendant's computer intrusion at LinkedIn.
Bruno Connelly	Mr. Connelly, an employee of LinkedIn, will testify regarding the investigation of defendant's computer intrusion at LinkedIn.  Mr. Connelly may also testify as an expert regarding LinkedIn's systems and his analysis of logs and other records of defendant's intrusions at LinkedIn, as reflected in the government's separate disclosure of expert testimony.
Tom Wiegand	Mr. Wiegand, an employee of Dropbox, will testify regarding the compromise of his Dropbox corporate credentials in connection with the intrusion into Dropbox computers.
United States Secret Service Special Agent Richard LaTulip	Special Agent LaTulip will authenticate the computer image seized during a search executed in Ukraine pursuant to a Mutual Legal Assistance Treaty request.
Joshua Anderson	Mr. Anderson, the senior administrator of Afraid.org, will testify regarding the Afraid.org subscriber records and will explain the Afraid.org DNS service.
Graham Abbott	Mr. Abbott, an employee of Dropbox, will testify regarding the Dropbox IP log and the underlying records.

DATED: March 8, 2020

Respectfully submitted,

DAVID L. ANDERSON  
United States Attorney

/s/  
MICHELLE J. KANE  
KATHERINE L. WAWRZYNIAK  
Assistant United States Attorneys